

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No: 2:24-cr-00043
	:	
CLAY WOLFE,	:	
	:	
Defendant.	:	

**ADDENDUM TO SENTENCING MEMORANDUM
OF DEFENDANT CLAY WOLFE**

Now comes Defendant, Clay Wolfe, by and through counsel Jon J. Saia, Attorney at Law, Supreme Court Registration Number 0037940 and co-counsel Susan Pettit, Attorney at Law, Supreme Court Registration Number 0067613, and hereby submits attached letters in support of his Sentencing Memorandum.

Respectfully submitted,

/s/ Jon J. Saia
Jon J. Saia (0037940)
Attorney at Law
Saia, Marrocco & Jensen, Inc.
713 South Front Street
Columbus, Ohio 43206
(614) 444-3036/jsaia@splaws.com

/s/ Susan Pettit
Susan Pettit (0067613)
Attorney at Law
713 S. Front Street
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that this document was filed electronically with the Court's electronic filing system on this 28th day of October 2024, which will send notice to all counsel of record in the above referenced matter.

/s/ Jon J. Saia _____

JON J. SAIA (0037940)

Attorney at Law

March 2, 2024

To whom it may concern,

I was recently asked if I would write a character letter for Clay Wolfe. I responded with an immediate yes, as Clay has been a kid that I have loved as long as he has been alive.

Our farm abutts the Wolfe farm and I have been blessed to spend almost all of my days on these acres. As farmers and members of a very small community, our families have often turned to each other whenever either has needed help. Clay's father has built two of the five homes on our family farm and a large percentage of the homes on our road. This family is well known and respected in our area.

Having grown up on the farm next door, I have found a special place in my heart for all of the Wolfe children, but especially Clay. I realize that he is now an adult, but it is funny to think of children I have known all their lives as adults. Clay went to work as somewhat of an apprentice to his father after graduating in the top part of his high school class. He has a brilliant mind, strong work ethic and kind heart. About eight years ago my husband and I were ready to build a new home. We chose Pat Wolfe to do the job before even considering anyone else. Work started in the summer of 2016 and my husband and young son spent almost every day on the worksite. Clay was so patient and attentive to our little guy. Explaining things, finding small jobs for him to help with and keeping an eye out for his safety. They became fast friends, this young adult man and preschool aged little boy. Never in my mind did I worry.

I feel that Clay is a good kid that got caught up in something he now realizes he shouldn't have. I understand the need for punishment when laws are broken, especially laws that protect our children. Clay seems much like a person that would benefit more from therapy and rehabilitation than endless years of incarceration. He is highly intelligent and can be an asset to our society if he receives such care.

I am sure that my opinion of the repercussions of his actions will have very little bearing on the outcome of his sentencing, but it is with the best intentions that I appeal to you seek treatment and rehabilitation for Clay's future.

Thank you so much for your time and consideration.

Sincerely,

Megan McCord

Your Honor,

Thank you for giving me the opportunity to write in regards to the Clay Wolfe sentencing currently pending in the court. My name is William Padgett, a long-time friend of the Wolfe Family. Although I am not privy to the details of the investigation, I am a career Law Enforcement officer (50 years). Most of my major felony investigations were in the Narcotics/Drug Trafficking investigations in Ohio. Many of my cases and convictions involved Healthcare professionals, Doctors, Nurses, Pharmacist's, private citizens, and other professionals.

I can honestly say that in my 50-year career, I was never made aware of Mr. Wolfe's activity in the violations he is presently charged with from my confidential informants, citizens, or Law Enforcement sources. This is not to say that he is not guilty of the charges presently filed against him.

In the years that I have known Mr. Wolfe as a High School student and Athlete I found him to be a hard worker, good student, and a team player. As an adult I have witnessed him again as a hard worker and active within our small community. As an adult I also witnessed him around High School students as a mentor and a Coach. I can say that on the many (hundreds) of activities around the students as a coach or community members I have never witnessed him do or say or do anything inappropriately with the athletes he was coaching.

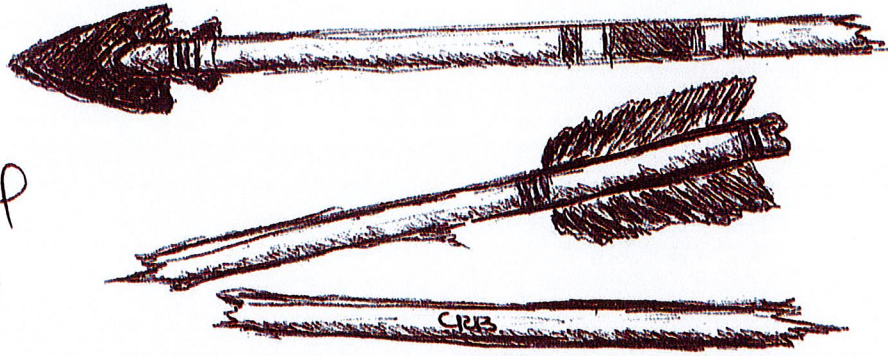
What I would like to ask from the Court is to take into consideration in the sentencing phase is credit for time that has already been served and to consider the minimum sentence for Mr. Wolfe with strict probation orders upon his release. I believe that given this opportunity, Mr. Wolfe will prove to the Court that he is aware and sorry for the things that he has done wrong and pled guilty to. I believe that Mr. Wolfe will be a model probationer after he is released and I am comfortable in saying this after dealing with hundreds of convicted felons during my career.

Thank you for giving me this opportunity to relay my thoughts to the Court and I can honestly say that I do not take this task lightly. Mr. Wolfe is one case that I did not hesitate to step forward with my thoughts regarding him and his well-respected family within our community.

Respectfully submitted,

William L. Padgett
1168 Cemetery Rd
New Lexington, Ohio 43764
740-621-1154 - Cell

April of
2024



To whom it may concern:

My name is Clyde (Rick) Beach of 249 Hill St., in Junction City, Ohio. I have known Clay Wolfe since he was a child and have been around him in social settings, in work related instances, and have hunted with him. In all situations I have found him to be pleasant, polite, and hard working. I have never seen him be disrespectful or a problem to anyone at any time. He is honest and devout as a family member or friend, eager at any time to lend a helping hand to anyone in need. He is in my humble estimation a Good human being.

Respectfully,
Clyde (Rick) Beach
740 - 621 - 1352

To whom it may concern;

We want to tell you about the Clay we know, not the Clay that got pulled into something that he became addicted to. Yes, we say addicted, just like someone gets addicted to alcohol or drugs.

Clay is kind, generous, funny and very talented. He taught himself to make knives on his own and became very good at forging them. He has donated many of his knives to local benefits for so many people. His donations have helped many people in our area.

When his sister was appointed the head girls' volleyball coach at her high school she asked him to be her assistant. Clay, knowing nothing about volleyball, told her yes. He studied videos on how to play the game and became her go to person. He was the voice of reason for her when things were not going the team way. The players loved him for his work ethic, how he would compete with them to make them better players.

He is a great brother to his brother and sister. He is the fun uncle to his two nephews. They love him so much. He makes wooden toys for them to play with, and they love the way he plays with them, hide and seek being their favorite. Even though they are young he tries to show them how to hold a bat correctly or how to pitch a ball. He is really good at calming them down when they are tired and things aren't going their way.

Clay has worked building houses with his dad since he graduated high school. He worked hard every day and has learned all of the ends and outs from his dad. He does things for his mom around the house, he does laundry, house cleaning and he is a very good cook! We don't have to ask him to do things for us he just does.

We know what he did was wrong, but as stated before, we believe he had an addiction that spiraled out of control. He has been going to two different therapist regularly. We think this is helping him and we are worried that he will not get the continued help that he will need to overcome this addiction.

Thank you for your time reading this and please consider this letter as you make your judgement.

Sincerely,

Pat and Marcie Wolfe

We are writing this letter on behalf of Clay Wolfe because we feel that he greatly regrets his actions and would like to restore his character as a dedicated, hardworking gentleman.

Growing up, Clay spent countless hours working tirelessly on his family's farm. He is also a talented craftsman who always took pride in his work. Clay, along with his father, have been contractors for many projects over the years in our home. We felt Clay was trustworthy and he was always polite and had a pleasant demeanor.

We wish Clay the best going forward and hope to see him and his dad working side by side again in our home.

Sincerely,
Jon & Carol Poling

July 31, 2024

To whom it may concern,

I am writing this letter to describe the character of Clay Thomas Wolfe. Clay is my younger cousin and our extended families have always been incredibly close. My siblings and the Wolfe children went to the pool together, played at the park together and I actually babysat the Wolfe children for a summer. We have maintained this closeness into adulthood.

I have only known Clay to be a sweet, kind and caring person with a deep love for his family and his dog Lacey. He has been raised to be a hard worker and has maintained that way of life into adulthood, with a great talent for woodworking and carpentry among other things. He has often participated in charity events and has donated handmade items to charity auctions. Clay is the first person to recognize an outstanding local person or business in the community as well. He is always willing to help out with nearly any task for his friends, family and extended family.

Thank you for taking this into consideration.

Kind regards,

Jill Snider

April 12, 2024

To Whom It May Concern:

I have known Clay for several years and he has always shown politeness and courteousness. He comes from a very close-knit family with good values and work ethic.

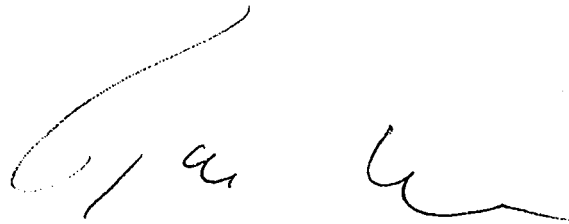
Clay has worked with his Dad doing home builds and remodels for as long as I've known him, and has grown up working on the family farm taking care of cattle and baling hay. He helped his Dad on projects in my home and always showed respect and professionalism. When the Township was in desperate need of help during emergency situations, such as flooding and snow storms, Clay was always there to help.

I believe that taking Clay away from his family (where he will receive the support he needs) for a lengthy period of time is not beneficial to him in receiving what he needs to make right his wrongs.

Thank you for your time and consideration.

Tina Fondale

My name is Tom Carney I've known Clay, since he was born always known him as being a fine young man never getting into trouble. I had a fire two years ago him and his father helped me get my place back in business very appreciative Wolfe family is well known family in our community.

A handwritten signature in black ink, appearing to read "Tom Carney". The signature is written in a cursive, flowing style with a long horizontal line extending from the end.

April 15, 2024

To Whom It May Concern:

First, I would like to say that I do not condone what Clay has done and I, along with the many people that know Clay, are as shocked as you could be of this. That being said, I would like to say some things if I may about Clay.

I have known Clay for many years on a friendship basis and a working relationship. Clay has gotten up every morning early and went to work and worked hard, working on the family farm and working along side his father building homes. Clay's whole family is hard working and productive, just as Clay is.

I personally have not talked to Clay since the news broke. And again, I do not condone what he has done. I know in my heart Clay knows he has done wrong. He is a very smart individual which was shown in his academics in school. I know Clay wants to seek help with counseling or whatever is recommended, not just for himself, but his family. Clay knows he has hurt his family and this family is as close knit as any I know. Clay has things going for him that most people do not, and that is a family that loves him and will not only support him, but make sure he gets the help he needs. I just know that jail time will not help him, but hurt him. Family is what is missing in this crazy world, but Clay has this and again, they will be there to make sure he gets the help he needs and to right this wrong.

Thank you ~

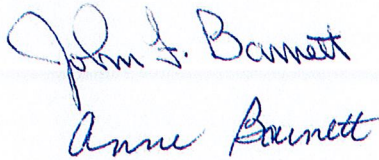
Frank Fondale

April 11, 2024

To Whom It May Concern,

We have known the Wolfe family all of our lives as we have resided in Junction City 76 years. We've come to know Clay Wolfe more in the last 7 years as he has worked on several projects at our home. Clay worked on projects both inside and outside our home and we found him to be very knowledgeable of all his work. He is a hard worker, always respectful and polite and took care of our home while the projects were going on. In all our experiences with Clay, we were pleased with his work ethic and integrity while fulfilling his responsibilities.

Sincerely,

The block contains two handwritten signatures in blue ink. The first signature, "John F. Barnett", is written in a cursive style with a large, looping initial 'J'. The second signature, "Anne Barnett", is also in cursive, with a more compact and fluid script.

John and Anne Barnett
114 E Poplar St.
Junction City, OH 43748